

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

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QUINTRELL MARTIN } 34

V.

DEBRA D. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

CRIMINAL ACTION

CASE NO: 2:06 CT 155-MHT

UNITED STATES OF  
AMERICA

MOTION REQUESTING A HEARING FOR  
CASE: JU-1991-970-01 BURGLARY IN THE  
FIRST DEGREE DOES IT APPLY FOR 924(e)  
PENALTY.

COMES NOW Defendant Quintrell T. Martin,  
files motion requesting this Honorable Court to hold a  
hearing on the above juvenile case which the State of  
Alabama classifies as a "violent felony".

## I. HISTORY AND RELEVANT FACTS

On 3-11-91, in Montgomery  
County the defendant Martin was eleven years old (11 years)  
he and two other juveniles which are his cousins went

to a neighbors house to swim. When they knocked on the neighbors door, no one was home. Without permission they entered the neighbors home and without permission took a video game. Defendant Martin and the other juveniles knew that no one was home and was not endangering no one. More importantly, the home and video game belongs to a friend of his and family. Moreover, the juveniles had entered the back door before with the owner of the video game when his (owner) parents were at work.

## II. CONCLUSION

For the above reason, the United States uses of December 18, 1991, Burglary in the 1<sup>st</sup> degree, case: JU-1991-970-01 for it 924(e) penalty is erroneously found that Defendant Martin as violent. Therefore, Defendant Martin prays that this Honorable Court grant a hearing on the above juvenile case which the United States is characterizing him at the age of eleven years old (11 years) as violent.

Respectfully Submitted

QUINTRELL MARTIN  
*Quintrell Martin*


## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served to the party to this cause by depositing a copy of the same in the United States mail with adequate postage addressed to:

Verne H. Speirs  
Assistant United States Attorney  
Post Office Box 197  
Montgomery, Al. 36101-197

Dated: January 10, 2007

Quintrell Martin  
Montgomery City Jail  
Montgomery, Alabama 36101



Quinnell Martin

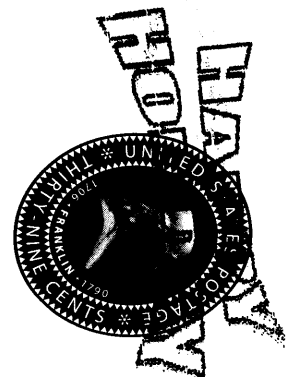
P.O. Box 159

Montgomery, Alabama

**INMATE MAIL**  
**Montgomery City Jail**

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